

U. S. Dist. Court  
District of New Jersey

Jasper Frazier } Jury Trial ☒ Yes ☐ No  
Plaintiff's }  
- Against - } Civil Action.

Commissioner Victoria L. Kuhn  
Commissioner Robert E. Carter  
S.W.S.P. Asst. Spt. Anthony Deguer  
S.W.S.P. Asst. Admin. AL Solanik  
S.W.S.P. Chaplain Phillip Harden  
N.S.P. / E.J.S.P. Admin. Patrick Mogan  
N.S.P. Chaplain "John Doe"  
E.J.S.P. Chaplain W. Pidegon  
Interstate Compact Donna Sweezy  
I. D. O. C. Interstate Compact Joel Gruber  
I. D. O. C. Chief Counsel Bob Bugher  
I. D. O. C. ATG. Margo Tucker  
The Geo Group Classification Glenda Cecil  
The Geo Group Unit Team Manager Shawne Nelson  
The Geo Group Case Manager Jama Jones

Attorney Jessica Webb  
Attorney Charles Little  
Defendants

## I. Parties in this complaint

1. Plaintiff: Jasper L. Frazier  
Street Address: East Jersey State Prison  
1100 Wood Bridge Rd; Lock Bag R  
County, City: Middlesex Rayway  
STATE and zip code: New Jersey 07065  
Telephone number: (732)-499-5010

B.

2. Defendant No. 1 Name: Commissioner  
Victoria L. Kuhn  
Street Address: STATE of New Jersey  
Dept. of Corrections Whittlesey Road  
P.O. Box 863  
County, City Mercer; Trenton  
State and zip code New Jersey 08625-0863

3. Defendant No. 2. Name: Commissioner Robert E. Carter  
Street Address: 302 West Washington Street I. G. C.S.  
County, City: Marion; Indianapolis  
State and zip code: Indiana 46204
4. Defendant no. 3. Name: Southwood State Prison Asst. Supt. Anthony Degner  
Street Address: 215 South Burlington Rd  
County, City: Cumberland; Bridgeton  
State and zip code: New Jersey 08302
5. Defendant No. 4 Name: Southwood State Prison Asst. Admin. AL Solanik  
Street Address: 215 South Burlington Rd  
County, City: Cumberland; Bridgeton  
State and zip code New Jersey 08302
6. Defendant no. 5. Name: Southwood State Prison Chaplain Phillip Harden  
Street Address: 215 South Burlington Rd

County, City: Cumberland; Bridgeton  
State and zip code: New Jersey 08302

7. Defendant No. 6. Administrator  
Patrick Moran  
Street Address: East Jersey State Prison  
1100 Wood Bridge Rd; Lock Bag R  
County, City: Middlesex Railway  
State and zip code: New Jersey 07065

8. Defendant No. 7. Name: Northern  
State Prison Chaplain John Doe  
Street Address: 215 South Burlington Rd  
County, City: Essex Newark  
State and zip code: New Jersey 07114-2300

9. Defendant No. 8 Name: Chaplain W. Pidegon  
Street: East Jersey State Prison 1100  
Wood Bridge Rd; Lock Bag R  
County, City: Middlesex Railway  
State and zip code: New Jersey 07065

10. Defendant No. 9. NAME: Interstate  
Compact Donna Sweeney  
Street Address: State of New Jersey  
Department of Corrections Whittlesey  
Rd. P.O. Box. 863  
County, City: Mercer Trenton  
State and Zip code: New Jersey 08625-0863

11. Defendant No. 10. NAME: I. D. O. C.  
Interstate Compact Joel Gruber  
Street Address: Indiana Department of  
Corrections 302 West Washington  
Street - Rm. E334  
County; City: Marion; Indianapolis  
State and zip code: Indiana, 46204

12. Defendant no. 11; 12 NAME: I. D. O. C.  
Chief Counsel Bob Byrher; Atg. Margo Tucker  
Street Address: E334 I. G. C. S.  
302 West Washington Street  
County; City; Marion; Indianapolis  
State and zip code: Indiana, 46204



13. Defendants No. 13, 14, And 15.

NAMES: Classification Glenda-Cecil, Unit Team manager - Shave Nelson and case manager - Jama Jones

Street Address: The Geo Group Private Prison New Castle Correctional Facility 1000 Van Nuys Rd. County; City; Henry; New Castle State; and zip code; Indiana 47362

14. Defendants No. 16 And 17. NAMES:

Saeed and Little Law Firm (Attorney Jessica Wegg and Attorney Charles Little)

Street Address: 189-133 West Market Street

County; City; Marion; Indianapolis State; and zip code; Indiana 46204

15. II. Basis for Jurisdiction

A. What is the basis for Federal court jurisdiction? (check all that apply)

☒ Federal Question      ☒ Diversity of -  
Citizenship

☐ U.S. Government      ☐ U.S. Government -  
Defendant

B. If the basis for jurisdiction is Federal Question, what Federal Constitutional, statutory or treaty right is at issue?

16. Defendant No. 1. Commissioner Robert E. Carter violated Plaintiff First Amendment Freedom of Expression, Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.) by moving Plaintiff to New Jersey Department of Corrections

in (4) civil lawsuit Plaintiff  
 settle with Commissioner Office  
 and State of Indiana. Plaintiff been  
 denied to practice his religion  
 "M.S.T.A. (Moorish Science Temple  
 of America), Denied Access to a  
 Religious Adviser Grand shiek for  
 Moorish Science Temple of America at  
 Southwood State Prison - northern  
 State Prison - East Jersey state Prison  
 Denied to order Moorish Science  
 Temple of America Necklace, Fez  
 or any Moorish Science Temple of  
 America religious Artifacts And  
 Denied to hold Moorish Science  
 Temple of America Religious Services.

17. Defendant no. 1 Commissioner  
 Robert E Carter violated Plaintiff  
~~Fourteenth Amendment~~ Denied  
 equal treatment to practice  
 his Religion Moorish Science  
 Temple of America inmates similar-



situated like Plaintiff under ICC.

18. Defendant No. 2 Commissioner Victoria L. Kuhn violated Plaintiff First Amendment Freedom of Speech, Freedom of Expression, Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.) by not implement policy to New Jersey Department of Corrections to place Moorish Science Temple of America on approve list for religion, order Religious Artifacts "Books, Necklace, fez etc.", Denied Access to Religious Advisor Grand Shiek for Moorish Science Temple of America at South Wood State Prison, Northern State Prison (R. H. U.) and East Jersey State Prison, and Denied to implement into Policy for New Jersey Dept. of Correction to hold religious service for Moorish Science Temple of America.

19. Defendant's No. 3, 4, 5. S.W.S.P.  
Asst. Supt. Anthony Deguer, Asst. Admin.  
AL Solanik and S.W.S.P. Chaplain  
Phillip Hardenuiolated Plaintiff First  
Amendment: Freedom of Speech,  
Freedom of Expression, Freedom of  
Religion under Religious Land Use  
and Institutionalized Person Act  
(R.L.U.I.P.A.) denying Plaintiff  
to practice Moorish Science Temple of  
America religion deem a religion  
in 7<sup>th</sup> District Court in Indiana,  
Illinois, Wisconsin, New York, Pa  
etc...., Denied Access to Religious  
Advisor Grand Shiek for Moorish  
Science Temple of America at S.W.S.P.  
And Denied to order religious  
artifacts "Books, necklace, Pez etc."  
and retaliation for Freedom of Speech.

20. Defendants No. 3, 4, and 5. S.W.S.P.  
Asst. Supt. Anthony Deguer, Asst.-  
Admin. AL solanik And S.W.S.P.-

Chaplain Phillip Harden Violated Plaintiff Fourteenth Amendment:  
Denied equal protection of the law to practice Moorish Science Temple of America religion inmates similar situated like Plaintiff get to practice there religion of choice at Southwood State Prison.

21. Defendant's No. 6 and 7 Administrator Patrick Nogen and Chaplain John Doe at northern state prison violated Plaintiff First Amendment: Freedom of Speech, Freedom of Expression, Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.), Denying Plaintiff Religious Advisor "Grandshiek" for Moorish Science Temple of America in Restricted housing Unit, while other religion Advisor was allowed to see other inmates and retaliation for -



Freedom of speech.

22. Defendants No. 6 and 7 Administrator Patrick Nagan and Chaplain "John Doe" at Northern State Prison violated Plaintiff Fourteenth Amendment: Denied Equal Protection of law to Practice Moorish Temple of America religion inmates similar situated like Plaintiff get to Practice there religion of choice At Northern State Prison

23. Defendants No. 6 AND 8. Administrator Patrick Nagan and Chaplain W. Pidegon violated Plaintiff First Amendment: Freedom of speech, Freedom of Expression, Freedom of religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.) Denying Plaintiff to practice his religion Moorish Science Temple of America deem a -

religion under 7<sup>th</sup> District Federal Courts (Indiana, Illinois, Wisconsin); New York, Pa, D.C. Va etc., Denied Access to religious Advisor Grand Shiek for Moorish Science Temple of America, Denied to purchase religion Artifacts " Fez, Necklace, Books etc.", And Denied to hold Moorish Science Temple of America Religion Service - and retaliation for Freedom of Speech.

24. Defendant's No. 6 and 8 Administrator Patrick Nagon and Chaplain W. - Pridgen violated Plaintiff Fourteenth Amendment: Denied equal Protection of the law to Practice Moorish Science Temple of America inmates similar situated like Plaintiff get to practice there religion of choice at East Jersey State Prison.



25. Defendant No. 9 Interstate Compact Donna Sweeney Violated Plaintiff First Amendment: Denying Plaintiff Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.), failure to Accommodate Plaintiff Religion Moorish Science Temple of America before arriving to New Jersey Dept. of Correction as a interstate Compact Inmate, failure to ANALYZE Plaintiff religion before arriving within New Jersey Department of Correction (S.W.S.P. - N.S.P. and E.J.S.P.), Denied Freedom of Speech, Freedom of Expression, Denied Religious Adviser Grand Shiekh for Moorish Science Temple of America, and co-sign with Indiana Department of Correction AtG. Margo Tucker, Chiefcounsel Bob Blyler and Joel Gruber to allow Plaintiff-

to be housed within New Jersey Department Corrections knowing he be denied to practice his religion Moorish Science Temple of America.

26. Defendant No. 9, Interstate Compact Donna Sweezy violated Plaintiff Fourteenth Amendment: Denied Equal Protection of the law in practice Moorish Science Temple of America inmates similar situated like Plaintiff within N.J.D.O.C. or I.C.C. get to practice there own religion.

Defendant's No. 10, 11 and 12. Interstate Compact Joel Gruber, I. D.O.C. Chief Counsel Bob Bygher And Atty. Margo Tucker violated Plaintiff First Amendment: Being in concert with N.J.D.O.C. to deny Plaintiff

Freedom of Speech, Freedom of Expression, Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.) to practice his religion. Moorish Science Temple of America, in concert with N.J.D.O.C. to deny Plaintiff to meet with Religious Clergy Grand Shiek of Moorish Science Temple of America, Deny to correspondence with Grand Shiek as a spiritual Advisor by being in concert with N.J.D.O.C. to prevent this, retaliation for Access to Courts in Indiana and New Jersey for freedom of Speech being in concert with N.J.D.O.C. to deny Plaintiff religious Artifacts "Fiz, Necklace - Sulete" and failure to maintain contract Plaintiff sign for settlement (4) lawsuits and/or Breach of contract.

27. Defendant's No. 10, 11 and 12 Interstate Compact Joel Gruber, F.D.O.C.-

-----, Chief Counsel Bob Byler and Atty. Margo Tucker violated Plaintiff Eight Amendment: Cruel and unusual punishment by being in concert with N. J. D. O. C. to shut Plaintiff completely "off" in practice his religion Moorish Science Temple of America, Denied access to a religious Clergy, Moorish Science Temple of America for spiritual advise by being in concert with Private Actors - The Geo Group and State Actors - N. J. D. O. C. to put this in place.

28. Defendants No. 10, 11 and 12. Interstate Compact Joel Ginter, J. D. O. C. Chief Counsel Bob Byler and Atty. Margo Tucker violated Plaintiff Fourteenth Amendment: Being in concert with Private Actors (The Geo Group) and (STATE Actors) -



N.J.D.O.C. to deny Plaintiff equal Protection of the law to practice his religion Moorish Science Temple of America inmates similar situated like Plaintiff get to practice there own religion within N.J.D.O.C.

29. Defendants No. 13, 14 and 15. The GEO Group Classification Glenda Cecil, Unit-Term Manager Shave Nelson and Case manager Dana Jones violated Plaintiff First Amendment: By being in concert (Private Actors) with (State-Actors) N.J.D.O.C. to deny Plaintiff Freedom of Religion under Religious Land Use And Institutionalized Person Act (R.L.U.I.P.A.) by classify Plaintiff to be housed within N.J.D.O.C. shut "off" to practice his religion Moorish Science Temple of America, Denied.



Access to Religious Clerk Grand Shiek "Moorish Science Temple of America"; failure to inform N.J.D.O.C. About Plaintiff religion on purpose before arriving on Interstate Compact And contribute to harass and retaliate with the aid and assistance of (State Actors) N.J.D.O.C.

30. Defendants No. 13, 14, And 15. The Geo Gap classification Glenda Cecil, Unit Team Manager Shave Nelson and Case manager Janna Jones Violated Plaintiff Eight Amendment: Being in concert with (State Actors) to inflict cruel and unusual punishment to deny Plaintiff Access to religious Clerk Grand Shiek And practice his religion Moorish Science Temple of America within N.J.D.O.C.

31 Defendants No. 13, 14, and 15. The Geo Group classification Glenda Cecil, Unit team Manager Shave Nelson and case manager Jama Jones violated Plaintiff Fourteenth Amendment: Being in concert with State Actors (N. J. D. O. C.) to deny Plaintiff Equal Protection of the law to practice his religion "Moonish Science Temple of America" inmates similar situated like Plaintiff within N. J. D. O. C. get to practice their religion freedom of choice.

32 Defendants No. 16 and 17. Attorney Jessica Wegg and Attorney Charles Little violated Plaintiff First Amendment: Indiana Professional Rules of Conduct 1.16 (a) Duty owed to client, by not filing any stipulation to settle (4) civil lawsuit order by Federal 7<sup>th</sup> Dist.

Court Judge Dinsmore to implement Plaintiff religion of choice Moorish Science Temple of America, retaliation for Freedom of Speech, failure to hold or maintain Fiduciary Duty to Plaintiff appointed by 7th District Court.

33. Defendant's No. 16 and 17. Attorney Jessica Wegg and Attorney Charles Little violated Plaintiff Eight Amendment: Enforcing cruel and unusual punishment with AIG. Mongo Tucker, chief counsel Bob Bob Byler and Interstate Compact Joel Gruber to deny Plaintiff Access to religious Clergy within N. J. D. O. C. And practice his religion Moorish Science Temple of America

34 Defendant's No. 16 and 17. Attorney Jessica Wegg and Attorney Charles -



Little violated Plaintiff Fourteenth Amendment: Denied equal protection of law, failure to implement to AtG. Maryo Tucker - Chief Counsel Bob Byler - Interstate Compact Joel Gruber And New Jersey Dept. Corrections Donna Sweavey Plaintiff religion as Moorish Science Temple of America inmates similar situated liked Plaintiff get to practice there own religion.

35. C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship  
Under 28 U.S.C. § 1331, a case involving the U.S. Constitution or federal laws or treaties is a federal question case

Defendant(s) state(s) of citizenship -  
Diversity of Citizenship - Under 28 U.S.C.

§ 1331, a case involving the U.S. Constitution or Federal laws or treaties is a federal question case And Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000.00.

### 36. III. STATE OF FACTS

37. On or about Feb. 26, 2021 - March 1, 2021 10:00 A.M. / 1:30 P.M. Plaintiff housed at The Geo Group Private Prison New Castle Correctional Facility.
38. Plaintiff had a settlement conference with I.D.O.C. Chief Counsel Bob Byher, I.D.O.C. Attorney General Margo Tucker, Attorney Jessica Wegg appointed by 7th Dist. Court on behalf of Plaintiff and Federal Judge Mark J. Dinsmore.



39. Plaintiff implemented to his Attorney Jessica Wegg in order to resolve the (4) civil lawsuits part of it, Plaintiff would need a (1) man cell, practice his religion Moorish Science Temple of America and no more harassment or retaliation from defendants when transfer out of state with the agreement in (4) civil lawsuits.

40. On or about March 5, 2021 - June 7, 2021 Plaintiff's Attorney's Jessica Wegg and Charles Little suppose to have filed a stipulation order by Federal courts to finalize the (4) civil lawsuit on Plaintiff behalf.

41. Plaintiff implemented the (1) man cell, practice his religion, Moorish Science Temple of America and no more retaliation from defendants with receiving state "out of state placement".

42. Plaintiff's Attorney's never filed anything on Plaintiff's behalf.

43. On or about April 5, 2021 9:00 A.M. Plaintiff housed at The Geo Group New Castle Corr. Facility had his family member email Indiana Attorney General Margo Tucker.

44. Plaintiff inform Margo Tucker about his religion "Moorish Science Temple of America", (1) man cell and when was the out of state placement would take place

45. Attorney General Margo Tucker email back to Plaintiff family member inform that she can't talk with or communicate with Plaintiff because he is represented by Atty's. Jessica Wegg / Charles Ciddle and have to communicate with-

them.

46. On or about April 5, 2021 Plaintiff email and /or call Atty. Jessica Wegg who answer the phone in a unprofessional tone what? what do you want? I'm bizzzy.

47. Plaintiff inform Atty. Ms. Wegg to Please make sure she implement the (1) man cell, practice his religion Moorish Science Temple of America and no more retaliation from defendant's

48. Plaintiff inform Atty. Jessica Wegg he can't communicate with Attorney General Mingo Tucker because he is represented by her and Charles Little.

49. Attorney Jessica Wegg then replied "Her boss Mr. Little" is conducting"

Margo about these issues.

50. On or about May 13, 2021 Plaintiff call Attorney Jessica Wegg again to follow up on stipulation she and Atty. Charles Little suppose to file with more issues dealing with the GEO Group.
51. Plaintiff inform Attorney Jessica Wegg he wasn't sign nothing until his demand is met with the defendants.
52. Attorney Jessica Wegg then tell at Plaintiff on the phone "My name is on the line and you better sign the paper to settle the (4) lawsuits.
53. Plaintiff then replied "He not sign nothing and he know the law just as much.



54. On or about May 27, 2021 9:00 A.M. Plaintiff housed at The Geo Group Private Prison Newcastle Corr. Facility (Restricted Housing Unit).
55. Plaintiff met with Asst. Vanderwaart and unit Team Shave Nelson sign the Agreement (4) civil lawsuit settlement thinking Attorney's Jessica Wegg / Charles Little fulfill their obligation to Plaintiff by filing the Stipulation
56. On or about June 4, 2021 Plaintiff house at The Geo Group Private Prison New Castle Correctional Facility (Restricted housing unit) encounter Classification Glenda Cecil.
57. Classification Glenda Cecil did a evaluation to determine his needs for X 22" N. J. D. O. C. " And never



implemented to XZZ "N. J. D. O. C." that Plaintiff religious preference is M.S.T.A. (Moorish Science Temple of America) . . . . Also sign by Unit Team Manager Shave Nelson and case manager Jama Jones.

58. On or about June 4, 2021 Plaintiff email Attorney Jessica Wegg inform her to "STOP trying to inform him his Constitutional Rights, he knew the law just as much she does and she in violation of Indiana Professional Rules of Conduct 1.16 (A) Duty owed to her client

59. On or about June 7, 2021 2:30 P.M. Plaintiff housed at The Geo Group Newcastle Corr. Facility (Restricted housing unit) was inform by Sgt. Turkey to pack up his property for "XZZ "N. J. D. O. C."

60. On or about June 7, 2021 6:30 p.m. Plaintiff arrive at Garden State Youth Facility Prison in Yardville, NJ
61. Plaintiff learn that Attorney's Jessica Wegg and Charles Little never filed NO Stipulation on Plaintiff behalf for (1) man cell; practice his religion Moorish Science Temple of America NOT Available at "X 22 N.J.D.O.C"
62. Plaintiff tried to place Attorney Jessica Wegg and Attorney Charles Little on his phone list at Garden State Youth Facility in Yardville, NJ.
63. Attorney's Jessica Wegg and Charles Little inform N.J.D.O.C NOT to place there numbers on Plaintiff phone list.

64. On or about June 11, 2021 8:00 A.M., S.I.D. "John Doe" white male call Plaintiff out
65. S.I.D. "John Doe" white male had the stipulation paper with Atty's Jessica Wegg and Mango Tucker note on it.
66. Plaintiff inform S.I.D. "John Doe" white male he need to talk with Atty. Jessica Wegg before he sign anything.
67. S.I.D. "John Doe" white male replied "She doesn't want you to have her number on your phone list and this stipulation was fax to me.
68. Plaintiff then replied "Atty's Jessica Wegg and Charles Little never filed any stipulation for

61) mancell or practice his religion  
moorish Science Temple of America, force  
under duress to sign the stipulation  
with Atty. Jessica Wegg and Atty.  
Margo Tucker name on it.

69. On or about June 22, 2021 Plaintiff  
transfer to Southwood State Prison  
without his property including his  
religious materials.

70. On or about July 9, 2021 8:25 A.M.  
Plaintiff filed a Jpay inquiry stating  
he been been denied his Freedom of  
religion at Southwood State Prison

71. On or about July 9, 2021 11:35 A.M.  
Plaintiff was called out Southwood  
State Prison Chaplain Phillip Harden.



72. Plaintiff was inform by chaplain Phillip Harden that he worked for Federal Prison as a chaplain before coming to work for South wood side Prison as a chaplain.
73. He is very familar with Moorish Science Temple of America as a religion, it's not common within State of New Jersey and Plaintiff wouldnt be allowed to order a Moorish Science Temple of America Fez or any religious artifacts.
74. Plaintiff then replied " This Violate his Freedom of Religion under Religious Land Use and Institutionalized Person Act. (R. L. U. I. P. A.)
75. Plaintiff inform Chaplain Phillip Harden that he been a

Moor since 2002 and have documented to prove in the system within Indiana Dept. of Correction Plaintiff religious preference is Moor (M.S.T.A.).

76. Southwood State Prison Chaplain Phillip Harden then email East Jersey State Prison Chaplain W. Pidgeon to see if they had a service for Moorish Science Temple of America.

77. On or about July 9, 2021 East Jersey State Prison W. Pidgeon responded "we do not have a Active M.S.T.A. group Active at E.J.S.P. email sent to Southwood State Prison Chaplain Phillip Harden.

78. On or about July 9, 2021 Plaintiff exhausted his state remedies on this subject Denied equal protection

of the law (R.C.U.I.P.A.)

79. On or about July 21, 2021 - March 16, 2022 Plaintiff was transfer to northern State Prison (Restricted housing Unit), Denied his Freedom of Religion, Religious Advisor - Grand Shiek by defendant P. Mogen- Chaplain "John Doe".
80. On or about July 29, 2021 Plaintiff filed a inquiry - Grievance - Appeal to N.J.D. J.C. central office denying Access to practice his religion "Moorish Science Temple of America"
81. On or about Oct. 6, 2021 Plaintiff filed a tort claim with Dept. of Treasury on denied to practice his religion... etc.
82. On or about Oct. 6, 2021 Interstate Compact Donna Sweavey wrote Plaintiff stating someone would see Plaintiff about his -

religion beliefs while house at northern state Prison (Restricted housing Unit).

83. On or about Oct. 6, 2021 northern state Prison Imam come to talk with Plaintiff while housed at northern State Prison (Restricted housing Unit).

84. Imam explain to Plaintiff there wasnt he could do for him because he was on Restricted housing Unit and have to wait until he is release

85. Plaintiff explain to Imam that his religion is different from Sunni or other Muslim here. We believe in the same God, but we have different prophet and different teachings a problem for certain Muslim in N.J.D.C. this is a problem for Plaintiff.



86. Since Plaintiff been within N.J.D.O.C. most Muslim doesn't honor Moorish Science Temple of America as Muslim or the State of Indiana, Illinois, Wisconsin, New York Pa, D.C. Va and so forth does honor Moorish Science Temple of America as Muslim (7th Dist. Court).
87. This is the reason why Plaintiff doesn't attend Muslim service at Southwood State Prison and East Jersey State Prison or when Imam come to see other Muslim inmates at Northern State Prison restricted housing unit
88. On or about Oct. 7, 2021 Plaintiff file a Tort claim a second time because Northern State Prison confiscated over \$500.00 in legal copies / legal mail postage that never the prison rec'd. (2:21-cv-16842-BRM-CW).

89. Plaintiff never recd nothing back.  
from Dept. of Treasury in Trenton NJ
90. While Plaintiff was housed in  
Restricted housing unit, his nephew died  
of a drug overdose, defendant P. Logan  
order Plaintiff phone to be shut off  
August 4, 2021- December 7, 2021 illegally  
re: Appellant Case pending A. 410. 21-TY;  
A. 811. 21-TY and pending lawsuit (2:21-cv-  
16842-BRM-cw). Plaintiff need a  
religious Adviser Grand Sheikh was denied.
91. On or about March 16, 2022 Plaintiff was  
transfer to East Jersey State Prison
92. On or about April 3, 2022 Plaintiff wrote  
to head quarters for Moorish science Temple  
of America in Chicago, ILL for spiritual  
guidance on East Coast (NJ, Pa, NY) and  
denied Freedom of Religion... etc.
93. On or about April 15, 2022 Plaintiff tried to  
order religious Artifacts -

Moorish Science Temple of America  
Necklace from George (Auter)   
out of Chicago, IL that sell  
Masons and Moorish religious  
materials. ("George Auter").

94 On or about April 13, 2022 Plaintiff  
was inform by chaplain at East  
Jersey State Prison W. Pidgeon  
on Jpay that M.S.T.A. (Moorish  
Science Temple of America) not on  
approval list to order religious  
Artifacts (Necklace Fez and etc.)

95. On or about April 14, 2022 Plaintiff  
inform Chaplain W. Pidgeon he  
denying Plaintiff Freedom of Religion  
and denied equal Protection of Law  
on Jpay EJS P 22013995

96 On or about April 14, 2022 East  
Jersey State Prison refuse to process  
order to Carter for Moorish Science

Temple of America necklace etc.

97. IV. Relief

98. Wherefore, Plaintiff respectfully prays that this court order defendants to allow Plaintiff access to Moorish Science Temple of America religious Advisor Grand Shiek or seek one on Plaintiff behalf since he new to N.J.D.O.C., order Moorish Science Temple of America religious artifacts (necklace, Fez or any religious artifacts deem not a security threat to prison) and allow Plaintiff to congregate or hold religious service for other Moorish members And enter judgement granting Plaintiff.

99. A declaration that the Acts and omission described herein



Violated Plaintiff's rights under First Amendment (Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.-I.P.A.), Freedom of Expression, Retaliation for Freedom of Speech, Fourteenth Amendment Denied equal protection inmates similar situated like Plaintiff get to practice there religion beliefs under the Constitution and laws of the United States

100. A Preliminary Injunction and T. R.O. to stop defendants from Retaliation, being in concert with each other to deny Plaintiff his religious belief, Freedom of Expression and Freedom of Religion, Allow Plaintiff to purchase religious artifacts (necklace, fez or any object that not a security threat to the prison and stop denying

Access to Religious Clergy through  
U.S. Postage Grand Shiek

101 Compensatory damages in the  
amount of \$ 100,000.00 Against  
each defendant jointly and severally.

102. Punitive damages in the amount  
of 100,000.00 Against each  
defendant

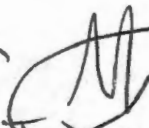
103. A jury trial on all issues triable  
by jury

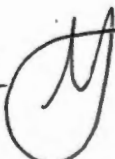
104 Plaintiff lost in this court

105. Any Additional relief this  
court deem just proper. Inevitable

I declare under penalty of  
perjury that the foregoing is true  
and correct 26<sup>th</sup> day of April 2022

Signed this 26<sup>th</sup> day of  
April 2022

Signature of Plaintiff   
Mailing Address: East Jersey State  
Prison 1100 Wood Bridge Rd Lock B03  
R Rahway, NJ 07065  
Telephone number: (732)-499-5010

Signature of Plaintiff   
/s/ Jasper Frazier 799545B